

MEMO ENDORSED

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Attorney General

USDS SDNY	STATE OF NEW YORK OFFICE OF THE ATTORNEY GENERAL
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August 7, 2008

BY FACSIMILE 212-805-7930

Hon. James C. Francis, U.S.M.J.
United States Courthouse
500 Pearl Street, Room 1960
New York, New York 10007

Re: Bryant v. N. Y. Psychiatric Inst., 07-CV-7794 (PKC)(JCF)

Dear Judge Francis:

The Office of the Attorney General represents the defendant in this action. I am writing to seek an extension of discovery, solely for the purpose of taking plaintiff's deposition. This is defendant's first request for an extension of discovery. The close of discovery is currently set for August 29, 2008. I have just received plaintiff's medical releases and need time to obtain plaintiff's medical records. Plaintiff advised that she had been away on vacation and had not received my follow-up letter and voice mail message regarding the releases. While I have not yet received plaintiff's responses to defendant's interrogatories and document responses, Ms. Bryant has indicated that I will receive them shortly; assuming that I receive them, no judicial intervention will be necessary. Because I will need the medical records and plaintiff's responses to defendant's discovery requests sufficiently before plaintiff's deposition, an extension of time is needed to take her deposition and, if necessary, depositions of any witnesses she identifies.

I will be out of the country from September 18 through 28, 2008 for a long-planned vacation and on October 13-14, 2008 for the Columbus Day weekend. I will also be out of the office for Yom Kippur on October 8, 2008. I am therefore requesting an extension for the close of discovery up to and including October 24, 2008. A corresponding extension for a summary judgment motion (or pretrial order if no such dispositive motion is made), currently scheduled for September 30, 2008, will also be needed, up to and including November 24, 2008. Plaintiff consents to this extension. The court's courtesies are greatly appreciated.

Respectfully submitted,

8/8/08
Amplification granted.
No further extensions.
SO ORDERED.
James C. Francis
Joanne Skolnick
Assistant Attorney General
cc: Debra Bryant, pro se (by FedEx)